

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2004 SEP -1 P 12:28

RANDY L. HANCOCK

Plaintiff,

v.

PRINCETON PROPERTIES
MANAGEMENT, INC. d/b/a
PRINCETON PROPERTIES
APARTMENTS, CHRISTIAN
H. GARGUREVICH and
ROLAND FONG d/b/a
R & R LAWN MAINTENANCE
& LANDSCAPING

Defendants.

CIVIL ACTION NO. 04-CV-10781 NMG

**PLAINTIFF'S ASSENTED TO MOTION FOR LEAVE TO AMEND HIS
COMPLAINT AND ADD A PARTY DEFENDANT**

NOW COMES the Plaintiff, Randy L. Hancock, and moves the Court for leave to file an Amended Complaint to increase the amount of damages requested and add Roland Fong d/b/a R & R Lawn Maintenance & Landscaping as a Defendant, pursuant to Rule 15(a) and Rule 21 of the Federal Rules of Civil Procedure. On grounds therefore, Plaintiff states as follows:

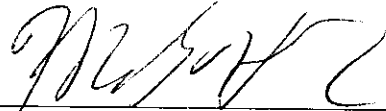
1. Since the filing of Plaintiff's original complaint, Plaintiff's injuries have continued to require far more medical treatment and expenses than originally contemplated.
2. In addition, the identity of a snow removal contractor was unknown to the Plaintiff at the time he filed his original complaint.
3. Plaintiff did not know of the identity of the snow removal contractor, R & R Lawn Maintenance & Landscaping until he was provided with the Defendant, Princeton Properties Management, Inc.'s Initial Disclosures.

4. Plaintiff has moved promptly to amend his complaint and the Defendant will not be prejudiced by permitting the Plaintiff to amend his complaint at this time.

5. Counsel for the Defendant, Princeton Properties assents to this motion.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant the Plaintiff leave to amend his complaint.

Respectfully Submitted,
Plaintiff
By his Attorney,

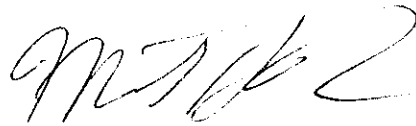
A handwritten signature in black ink, appearing to read 'M. Hancock', written over a horizontal line.

Martin S. Hancock, Esq.
(B.B.O. No. 657223)

MARTIN HANCOCK
35 Pratt Ave., Suite 4
Lowell, MA 01851
Telephone: (978) 376-2843
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Martin S. Hancock, Esq., hereby certify that I electronically filed Plaintiff's Assented to Motion For Leave To Amend His Complaint And Add A Party Defendant, Amended Complaint, and Proposed Order Granting Plaintiff's Assented To Motion For Leave To Amend His Complaint And A Party Defendant with the Clerk of Court using the CM/ECF system and mailed a courtesy copy to the Clerk of Court, clearly marked "Courtesy Copy - Do Not Scan" in red ink, on the first page of the above document's caption, by first-class United States Mail, postage prepaid, and properly addressed. I also hereby certify that a true and accurate copy of the foregoing was served upon the following parties, this 30th day of August 2004, by first-class United States Mail, postage prepaid, and properly addressed.



Martin S. Hancock, Esq.

Denise M. Lauretti, Esq.
Horn & Lauretti
225 Friend Street, Suite 203
Boston, MA 02114

Christian H. Gargurevich
Princeton Properties Apartments
Building 736
678 Princeton Blvd.
Lowell, MA 01851

Attn: Civil Clerk of Court
John Joseph Moakley
U.S. District Court
1 Courthouse Way, Suite 2300
Boston, MA 02210